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February 27, 2025

Via ECF

The Honorable John P. Cronan
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: United States v. Clinton McCullum
No. 24 Cr. 667 (JPC)

Dear Judge Cronan:

We respectfully submit this letter on behalf of our client, Clinton McCullum, to request a three-week adjournment of all deadlines relating to the defendant's motion to suppress and a 30-day adjournment of the parties' respective expert disclosure deadlines. The parties are continuing to discuss a possible pretrial disposition of the case and therefore seek to adjourn the briefing schedule to allow those discussions to continue prior to motion practice. The parties have conferred and propose the following amended schedule:

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Defendant's motion to suppress deadline: March 26, 2025

Government's opposition deadline: April 16, 2025

Defendant's reply brief deadline: April 25, 2025

Government's Rule 16 expert disclosure deadline: March 31, 2025

Defendant's Rule 16 expert disclosure deadline: April 28, 2025

The parties also respectfully request that the Court adjourn the next hearing, scheduled for April 29, 2025, and reschedule it to a date convenient for the Court that is approximately three weeks after the defendant's reply brief deadline, April 25, 2025. We have consulted with the government, which consents with this request and the above-requested schedule.

We also have no objection to the exclusion of time, pursuant to 18 U.S.C. § 3161(h)(7)(A), through the new hearing date to be set by the Court approximately three weeks after April 25, 2025, on the basis that the ends of justice served by such an exclusion outweigh the best interest of the public and the defendant in a speedy trial insofar as the exclusion would allow the parties to continue discussions regarding a potential pretrial resolution and for the defense to prepare pretrial motions if necessary.

Respectfully submitted,

/s/ David B. Anders

David B. Anders

Emily P. Ross

Brian J. Liu

Counsel for Clinton McCullum

cc: Getzel Berger, Esq.

The request is granted. The parties' proposed briefing schedule on Defendant's motion to suppress and the parties' proposed deadlines for expert disclosures under Federal Rule of Criminal Procedure 16 are adopted. The April 29, 2025 status conference is adjourned to May 16, 2025 at 10:00 a.m. Time is excluded from April 29, 2025 to May 16, 2025 pursuant to the provisions of the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A). The Court finds that the ends of justice served by granting this exclusion outweigh the best interests of the public of the defendant in a speedy trial because the exclusion will allow the parties to continue discussions regarding a potential pretrial resolution of this matter and for the defense to prepare pretrial motions. The Clerk of Court is respectfully directed to close Docket Number 19.

SO ORDERED.

Date: February 28, 2025
New York, New York


JOHN P. CRONAN
United States District Judge